

Exhibit A

August, John J

From: Hazam, Lexi J. <lhazam@lchb.com>
Sent: Friday, January 13, 2023 6:56 PM
To: Simonsen, Ashley M; Benson, Frederick; Benov, Matthew; O'Boyle, Laura K.; Regan-Smith, Hannah; jonathan.blavin@mto.com; lauren.bell@mto.com; David Mattern; smachock@wsgr.com; cseeger@seegerweiss.com; pwarren@motleyrice.com; Christopher Ayers; Orent, Jonathan D.; Lichtman, Jason L.; McNabb, Kelly K.; JScullion@seegerweiss.com; Jasinski, Mathew; Amy Fiterman; victoria.degtyareva@mto.com; ariel.teshuva@mto.com; 'Feinstein, Diana M.'
Cc: Jones, Phyllis; Schmidt, Paul
Subject: RE: [EXT] MDL 3047 - Interim Agreement re January 17 Production

EXTERNAL

Thanks Ashley. We agree subject to the edits in blue below, so that the agreement is commensurate with 502(d). To also answer Amy's email, we can so agree as to TikTok's January 17 productions also.

Lexi

**Lieff
Cabrer
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Bernstein**
Attorneys at Law

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f 415.956.1008

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San Francisco, CA 94111-3339
www.lieffcabrer.com

From: Simonsen, Ashley M <asimonsen@cov.com>
Sent: Friday, January 13, 2023 7:56 AM
To: Hazam, Lexi J. <lhazam@lchb.com>; Benson, Frederick <FBenson@cov.com>; Benov, Matthew <mbenov@cov.com>; O'Boyle, Laura K. <LOBoyle@gibsondunn.com>; Regan-Smith, Hannah <HRegan-Smith@gibsondunn.com>; jonathan.blavin@mto.com; lauren.bell@mto.com; David Mattern <DMattern@kslaw.com>; smachock@wsgr.com; cseeger@seegerweiss.com; pwarren@motleyrice.com; Christopher Ayers <CAyers@seegerweiss.com>; Orent, Jonathan D. <jorent@motleyrice.com>; Lichtman, Jason L. <jlichtman@lchb.com>; McNabb, Kelly K. <kmcnabb@lchb.com>; JScullion@seegerweiss.com; Jasinski, Mathew <mjasinski@motleyrice.com>; Amy Fiterman <amy.fiterman@faegredrinker.com>; victoria.degtyareva@mto.com; ariel.teshuva@mto.com; 'Feinstein, Diana M.' <DFeinstein@gibsondunn.com>
Cc: Jones, Phyllis <pajones@cov.com>; Schmidt, Paul <pschmidt@cov.com>
Subject: [EXT] MDL 3047 - Interim Agreement re January 17 Production

[Changing the subject line for clarity]

Thanks, Lexi; your understanding is correct. We propose an interim agreement under which Meta would re-produce, and plaintiffs would agree to treat, the January 17 Production as highly confidential until a protective order is entered by the Court and Meta has formally designated the documents under that protective order. See 12/23/22 Email from P. Warren at 6:07 a.m. ET (Haugen Documents); 12/22/22 Email from P. Warren at 9:26 p.m. ET (Molly Russell Documents). On claw-backs, we propose an agreement that attorney-client privilege or work-product protection is not waived by disclosure, whether inadvertent or otherwise, connected with the January 17 Production. If plaintiffs become

aware that they have received **such** privileged or protected material, they will notify Meta and take reasonable steps to return and/or destroy the material. If Meta becomes aware of the disclosure of **such** privileged or protected material, it will notify plaintiffs and, if applicable, will provide a redacted version of the material. If and when a 502(d) stipulation is agreed to by the parties and entered by the Court, it will supersede this agreement.

Please confirm this is acceptable to plaintiffs.

Thank you,

Ashley Simonsen

Pronouns: She/Her/Hers

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COVINGTON

From: Hazam, Lexi J. <lhazam@lchb.com>

Sent: Thursday, January 12, 2023 1:43 PM

To: Simonsen, Ashley M <asimonsen@cov.com>; Benson, Frederick <FBenson@cov.com>; Benov, Matthew <mbenov@cov.com>; O'Boyle, Laura K. <LOBoyle@gibsondunn.com>; Regan-Smith, Hannah <HRegan-Smith@gibsondunn.com>; jonathan.blavin@mto.com; lauren.bell@mto.com; David Mattern <DMattern@kslaw.com>; smachock@wsgr.com; cseeger@seegerweiss.com; pwarren@motleyrice.com; Christopher Ayers <CAyers@seegerweiss.com>; Orent, Jonathan D. <jorent@motleyrice.com>; Lichtman, Jason L. <jlichtman@lchb.com>; McNabb, Kelly K. <kmcnabb@lchb.com>; JScullion@seegerweiss.com; Jasinski, Mathew <mjasinski@motleyrice.com>; Amy Fiterman <amy.fiterman@faegredrinker.com>; victoria.degtzareva@mto.com; ariel.teshuva@mto.com; 'Feinstein, Diana M.' <DFeinstein@gibsondunn.com>

Subject: RE: [EXT] RE: Social Media MDL--meet and confer re protective order

[EXTERNAL]

Thanks Ashley. As we just discussed, we are not agreeable to conditioning the production on agreement to a 502(d) order, and we understand Defendants are not taking such a position. Given the upcoming weekend/holiday we are not going to be able to review and then provide edits/comments and meet and confer on this on the timeline you note, given it was just received. We are willing to agree via a brief email to a basic interim understanding on the issue as was done with regards to designations for the Haugen documents.

Thanks,

Lexi

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From: Simonsen, Ashley M <asimonsen@cov.com>

Sent: Thursday, January 12, 2023 1:37 PM

To: Hazam, Lexi J. <lhazam@lchb.com>; Benson, Frederick <FBenson@cov.com>; Benov, Matthew <mbenov@cov.com>; O'Boyle, Laura K. <LOBoyle@gibsondunn.com>; Regan-Smith, Hannah <HRegan-Smith@gibsondunn.com>; jonathan.blavin@mto.com; lauren.bell@mto.com; David Mattern <DMattern@kslaw.com>; smachock@wsgr.com; cseeger@seegerweiss.com; pwarren@motleyrice.com; Christopher Ayers <CAyers@seegerweiss.com>; Orent, Jonathan D. <jorent@motleyrice.com>; Lichtman, Jason L. <jlichtman@lchb.com>; McNabb, Kelly K. <kmcnabb@lchb.com>; JScullion@seegerweiss.com; Jasinski, Mathew <mjasinski@motleyrice.com>; Amy Fiterman <amy.fiterman@faegredrinker.com>; victoria.degtyareva@mto.com; ariel.teshuva@mto.com; 'Feinstein, Diana M.' <DFeinstein@gibsondunn.com>

Subject: [EXT] RE: Social Media MDL--meet and confer re protective order

Lexi, all,

As just discussed, please find attached for your review Defendants' proposed 502(d) Order. If at all possible, we would like to submit this to the Court in advance of the production next week but are happy to discuss and welcome any comments you may have in the meantime.

Regards,

Ashley Simonsen

Pronouns: She/Her/Hers

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COVINGTON

-----Original Appointment-----

From: Hazam, Lexi J. <lhazam@lchb.com>

Sent: Wednesday, January 11, 2023 6:02 PM

To: Hazam, Lexi J.; Simonsen, Ashley M; Benson, Frederick; Benov, Matthew; O'Boyle, Laura K.; Regan-Smith, Hannah; jonathan.blavin@mto.com; lauren.bell@mto.com; David Mattern; smachock@wsgr.com; cseeger@seegerweiss.com; pwarren@motleyrice.com; Christopher Ayers; Orent, Jonathan D.; Lichtman, Jason L.; McNabb, Kelly K.; JScullion@seegerweiss.com; Jasinski, Mathew; Amy Fiterman; victoria.degtyareva@mto.com; ariel.teshuva@mto.com; 'Feinstein, Diana M.'

Subject: Social Media MDL--meet and confer re protective order

When: Thursday, January 12, 2023 1:00 PM-1:45 PM (UTC-08:00) Pacific Time (US & Canada).

Where: <https://lchb.zoom.us/j/96538905017?pwd=RE9GYnRweVpTYWZNbnR6bERCQWdiQT09>

[EXTERNAL]

Lexi Hazam is inviting you to a scheduled Zoom meeting.

Topic: Social Media MDL--meet and confer re protective order

Time: Jan 12, 2023 01:00 PM Pacific Time (US and Canada)

Join Zoom Meeting

<https://lchb.zoom.us/j/96538905017?pwd=RE9GYnRweVpTYWZNbnR6bERCQWdiQT09>

Meeting ID: 965 3890 5017

Passcode: 669782

One tap mobile

+16699009128,,96538905017# US (San Jose)

+16694449171,,96538905017# US

Dial by your location

+1 669 900 9128 US (San Jose)

+1 669 444 9171 US

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